



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 28, 2020

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007


Re: *United States v. Zhongsan Liu*, S1 19 Cr. 804 (VEC)

Dear Judge Caproni:

The Government writes to respectfully request that the Court exclude speedy trial time in the above-referenced matter through November 10, 2020, the date that pretrial motions briefing in this case is scheduled to conclude. On May 6, 2020, the Court excluded time through September 1, 2020. The Government respectfully submits that the exclusion of time through November 10, 2020 outweighs the best interests of the defendant and the public in a speedy trial, because it will allow the defendant to prepare, and the Court to adjudicate, pretrial motions in advance of any trial in this matter. The defendant consents to this application through his counsel.

Respectfully submitted,

AUDREY STRAUSS
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Southern District of New York

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cc: Defense Counsel (by ECF)